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December 27, 2024

Hon. Yvonne Gonzalez Rogers
United States District Court for the Northern District of California
Oakland Courthouse
1301 Clay Street
Oakland, CA 94612

***In Re: Social Media Adolescent Addiction/Personal Injury Products Liability
Litigation***

Case No. 4:22-md-03047-YGR

Dear Judge Gonzalez Rogers:

Pursuant to Case Management Order No. 19 (ECF No. 1383 at 3), as well as Your Honor's Order Setting Initial Conference (ECF No. 2), I respectfully seek appointment as a member of the School District Leadership Subcommittee in the matter of *In re Social Media Adolescent Addiction/Personal Injury Products Liability Litig.*, No. 4:22-md-03047-YGR (N.D. Cal.).

This is the first time I am seeking a leadership role in MDL litigation. I am doing so because I am highly committed to this case, as demonstrated by my advocacy for two bellwether School Districts I represent, Harford County (Maryland) and Spartanburg County School District Six (South Carolina), and my work to date in support of the School District Subcommittee. Based on this work I have the support of Plaintiffs' Co-Lead Counsel and the Chairs of the School District Leadership Subcommittee for my application.

I am an attorney based in Baltimore, Maryland and have been practicing law for eight years. *See* Resume (Ex. B). As part of my representation of Harford and Spartanburg Six during ongoing intensive discovery, I have dedicated more than 250 hours of common benefit work. Other members of my firm have contributed an additional 150 hours of common benefit work to this litigation. This work includes navigating preservation issues and overseeing, along with my co-counsel, all aspects of discovery on these bellwethers, including the preservation and collection of documents, supervising the review of collected materials, and meeting and conferring with defense counsel to resolve various discovery disputes. Throughout this process, I have worked collaboratively with counsel for the other bellwether school districts, and I have maintained a professional discourse with defense counsel. Additionally, I am a member of the committee that is reviewing, vetting, and assembling experts who will testify on behalf of school

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districts at trial. I am prepared to further increase my commitment to this litigation for its duration, which already comprises a significant portion of my practice.

Beyond my representation of two bellwether school districts, my firm represents more than 80 school districts in this litigation of varying sizes and demographics. This includes large school districts such as Wake County Board of Education (North Carolina), medium-sized school districts such as Cincinnati Public Schools Board of Education (Ohio), and small school districts such as the Board of Education of Somerset County (Maryland). This varied client base has given me in-depth familiarity with the challenges school districts nationwide face as a result of social media addiction, and how to navigate prosecuting their claims in this litigation. As part of this representation, I work closely with each school district to keep them updated on the status of the litigation and ensure compliance with preservation obligations and timely completion of Plaintiff's Fact Sheets and Supplemental Plaintiff's Fact Sheets.

1. Professional experience in this type of litigation, including MDL experience as lead or liaison counsel and/or service on any plaintiffs' committees or subcommittees.

Separate from my work on this litigation, I have been involved in several multidistrict litigations. My firm represents 60 school districts in the JUUL litigation (*In re: Juul Labs, Inc. Marketing, Sales Practices & Products Liability*, 3:19-md-2913-WHO) and 17 water providers and property owners in the AFFF multidistrict litigation (*In re: Aqueous Film-Forming Foams Products Liability Litigation*, 2:18-mn-02873-RMG). Additionally, my firm previously represented more than 40 cities and counties in Florida, South Carolina, and Kentucky in the opioid multidistrict litigation (*In re: National Prescription Opiate Litigation*, 1:17-md-2804-DAP).

In addition to multidistrict litigation representation, I have been involved in complex litigation led by my firm, including a series of significant environmental matters. These fact intensive cases in state and federal court resolved after contentious litigation for hundreds of millions of dollars. These include *Cuppels v. Mountaire Corporation et al.*, Civil Action No. S18C-06-009 CAK and *In re: New Indy Emissions Litigation*, 0:21-cv-01480-SAL; 0:21-cv-01704-SAL.

2. The names and contact information of judges before whom the applicant has appeared in the matters discussed in response to No 1 above.

Because I did not serve on leadership in the above-mentioned litigations, I did not directly appear before the presiding judges.

3. Willingness and ability immediately to commit to time-consuming litigation.

As stated above, I have already committed hundreds of hours to this litigation and am prepared to continue to do so as this case progresses. I have the willingness, eagerness, and

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ability to continue to make this commitment. I would welcome my first opportunity to serve in MDL leadership at this initial tier.

4. Willingness and ability to work cooperatively with other plaintiffs' counsel and defense counsel.

As I explained above, I have worked cooperatively and collaboratively with other plaintiffs' counsel throughout this litigation. Additionally, I have maintained professional relationships with defense counsel.

5. Access to resources to prosecute the litigation in a timely manner.

My law firm has 29 lawyers in a variety of practice areas, seven of whom concentrate in multidistrict, class action, and other complex plaintiffs litigation. We have multiple lawyers with decades of experience and substantial trial experience. Additionally, my firm has a track record of making deep financial commitments to consolidated and/or class action cases. This includes expending tens of thousands of hours of common benefit time and millions of dollars in common benefit expenses where necessary in the prosecution of a matter.

6. Willingness to serve as lead counsel, a member of a steering committee, or both.

At this time, I am seeking a position on the School District Leadership Subcommittee.

7. Litigation funding.

My law firm has never used litigation funders and will not use them in this litigation.

Sincerely,



Matthew P. Legg

MPL/es

Cc: Lexi J. Hazam, Esquire
Kelly K. McNabb, Esquire